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July 18, 2014

VIA ECF

The Honorable William H. Pauley III
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1920
New York, NY 10007

Re: *Moore Macro Fund, LP, et al. v. Lehman Brothers Holdings Inc., et al.*,
Case No. 14-cv-05053 (WHP)

Dear Judge Pauley:

We represent defendants Lehman Brothers Holdings Inc., Lehman Brothers Special Financing Inc., and Lehman Brothers Commercial Corporation (collectively, “Lehman”) in the above-captioned proceeding. We write pursuant to Federal Rule of Civil Procedure 6(b) to request an extension of time for briefing to be filed in connection with the Motion to Withdraw the Bankruptcy Reference (Docket No. 1) (the “Motion”) submitted by plaintiffs Moore Macro Fund, LP, Moore Macro Markets Fund (Master), LP, SJL Moore, Ltd., JR Moore, LP, LM Moore LP, MF Moore LP (formerly Moore Global Fixed Income Fund (Master) LP), Moore Global Investments, LTD., Moore Emerging Markets Fund (Master) LP, Moore Capital Advisors, L.L.C., and Trade Process Corporation (collectively, “Moore”).

On May 30, 2014, Moore filed an adversary complaint against Lehman in the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”). Chapter 11 Case No. 08-13555 (SCC), Bankr. Ct. Case No. 14-02021 (SCC). On July 3, 2014, Lehman filed an Answer and Counterclaims in the Bankruptcy Court. Also on July 3, 2014, Moore filed the instant Motion to withdraw the reference from the Bankruptcy Court to the District Court. Lehman’s opposition to the Motion must be filed by July 21, 2014, pursuant to Local Civil Rule 6.1(b). Lehman and Moore have not made any previous requests for an extension.

Lehman and Moore have agreed to the following schedule for briefing in connection with the Motion:

The Honorable William H. Pauley III
July 18, 2014
Page 2

- The time for Lehman to oppose the Motion will be extended up to and including August 4, 2014.
- The time for Moore to reply will be extended up to and including August 18, 2014.

Lehman requests the Court to “so order” the foregoing schedule. We are available at the Court’s convenience.

Respectfully,

/s/ Tracy V. Schaffer
Tracy V. Schaffer

cc: Counsel for Plaintiffs (by e-mail)

NYI-4600205v1